

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division**

In re:

DANIEL ALAN MURRAY

Case No. 08-50008

Chapter 13

Debtor(s)

Motion for Allowance of Attorney's Fees

To The Honorable Ross W. Krumm, Chief U.S. Bankruptcy Judge:

Comes now W. Stephen Scott of the law firm of Scott Kroner, PLC., counsel for the Debtor, in the above-styled case, and states unto the Court as follows:

1. Prior to the filing of the Debtor's petition in this case counsel to the Debtor was paid \$5,200.00 representing a fee of \$4,896.00 for attorneys fees and expenses in this case, plus filing fees and credit report fee of \$304.00.

2. Attached hereto are counsel's contemporaneous time records reflecting that counsel has incurred time charges for professional services rendered in the amount of \$8,050.00 through April 29, 2008. Counsel's hourly rate is \$250.00 per hour, and the paralegal rate of Joan Hackett-Scott is \$100 per hour.

Accordingly, counsel for the Debtor respectfully requests the Court to enter an order finding such fees to be reasonable and to allow them as compensation for services rendered to the Debtor in this proceeding, and for such other and further relief as is proper.

Notice of Hearing

PLEASE TAKE NOTICE that the undersigned will move the United States Bankruptcy Court for the relief requested in this **Motion**, at a hearing in Federal Courtroom, 3rd Floor, U.S. Courthouse, 116 N. Main Street, Harrisonburg, VA, on **July 9, 2008 at 10:00 A.M.**, or as soon thereafter as the parties may be heard.

Dated: May 6, 2008.

Respectfully submitted,

Scott Kroner, PLC.
Counsel to the Debtor

/s/ W. Stephen Scott
W. Stephen Scott, Esquire (VSB#14301)
Scott | Kroner, PLC.
P. O. Box 2737
418 E. Water St.
Charlottesville, VA 22902
(434) 296-2161
wscott@scottkroner.com
Attorney for the Debtor

5/2/2008
12:59 PMSCOTT KRONER, PLC
Pre-bill Worksheet

Page 1

Nickname MURRAY DANIEL | CHAPTER 13
 Full Name Daniel Alan Murray
 Address 277 Lake Drive
 Greenville, VA 24440
 Phone 1 540-292-2970 Phone 2
 Phone 3 Phone 4 46906.001
 In Ref To Chapter 13 Bankruptcy Case No. 08-50008
 Fees Arrg. By billing value on each slip
 Expense Arrg. By billing value on each slip
 Tax Profile Exempt
 Round Fees 3 Minutes
 Interest 18.00%, Simple, Charge after 30 days with grace period of 0 days.
 Last bill
 Last charge 5/1/2008
 Last payment 1/7/2008 Amount \$4,896.00

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/28/2007 41122	WSS Meeting with Meeting with client to discuss financial situation and foreclosures pending on real estate in Philadelphia, and options of filing chapter 13	250.00	2.00	500.00	Billable
12/31/2007 41625	JHS Meeting with Meeting with client to review draft schedules	100.00	2.50	250.00	Billable
12/31/2007 41838	WSS Meeting with Meeting with client and JHS to review information for preparation of schedules for filing chapter 13	250.00	0.70	175.00	Billable
1/2/2008 41626	JHS Begin Begin drafting bankruptcy schedules	100.00	2.50	250.00	Billable
1/2/2008 41839	WSS Conference with Conference with JHS regarding documentation on schedules	250.00	0.50	125.00	Billable
1/3/2008 41627	JHS Complete Complete draft of schedules and review with WSS	100.00	6.00	600.00	Billable
1/3/2008 41840	WSS Review Review draft of schedules and edit same-begin work on plan	250.00	1.10	275.00	Billable
1/4/2008 41628	JHS Meeting with Meeting with client and WSS to review first computer draft of bankruptcy schedules, plan etc., make edits, review in final form with client. Send out Plan, Schedules I & J and Creditor Matrix to creditors.	100.00	5.50	550.00	Billable

5/2/2008
12:59 PMSCOTT KRONER, PLC
Pre-bill Worksheet

Page 2

MURRAY DANIEL: Daniel Alan Murray (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/4/2008 41841	WSS Meeting with Meeting with client to review schedules, draft and revise plan, discuss how to fund plan and related issues, and file same	250.00	4.00	1,000.00	Billable
1/22/2008 42012	JHS Review Review letter from Trustee requesting documents from Debtor; review file, organize documents for request, prepare for delivery to Trustee	100.00	1.50	150.00	Billable
1/25/2008 42045	WSS Meeting with Meeting with client to review status of plan and review documents and related issues concerning case	250.00	1.50	375.00	Billable
1/30/2008 42280	WSS Work on Work on arranging for mortgage payment to PHH-various emails to parties and counsel to determine proper procedure	250.00	0.90	225.00	Billable
1/30/2008 43238	JHS Preparation of Preparation of checks and cover letter to PHH Mortgage and send post-petition payments on 609 and 620 Sigel	100.00	0.50	50.00	Billable
2/4/2008 43155	WSS Work on Research cases to support contingency nature of loan to LLC	250.00	1.30	325.00	Billable
2/5/2008 43158	WSS Attend Attend 341 meeting in Staunton and confer w/ client re additional information for case	250.00	2.00	500.00	Billable
2/5/2008 43239	JHS Review Review file of tenant leases, prepare list and compare with schedules. Call to client to confirm list.	100.00	0.70	70.00	Billable
2/7/2008 43240	JHS Telephone conf Telephone conference with client regarding tenant list for amended Schedule G; discuss issue of no billing from Chrysler Credit on Van-unable to make January payment; review claim filed by Daimler Chrysler-note to WSS; finalize amended Schedule G and review with client via phone call before sending to him for signing; review client's last billing from Daimler Chrysler and his last payment date and review same with client-appears that December payment may have been in arrears at filing	100.00	0.70	70.00	Billable

5/2/2008
12:59 PMSCOTT KRONER, PLC
Pre-bill Worksheet

Page 3

MURRAY DANIEL: Daniel Alan Murray (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/12/2008 43180	WSS Conference with Conference with JHS re amendments to schedules-	250.00	0.50	125.00	Billable
2/12/2008 43241	JHS Review Receive signed amended schedule G from client and prepare in final form for filing with court by WSS. Telephone conference with attorney for Daimler Chrysler and determine address where client should send post-petition payments and confirm status of payments and prepetition arrearage of December payment...advise client via email. Send chpt 13 notices to tenants listed on schedule G.	100.00	1.50	150.00	Billable
2/13/2008 43190	WSS Draft Draft and get approval and file direct pay order	250.00	0.50	125.00	Billable
2/19/2008 43242	JHS Send Send email to client instructing him as to disposition of 401k proceeds to be paid to into plan	100.00	0.10	10.00	Billable
3/3/2008 43682	WSS Review Review plan matters and amendments needed-draft amended plan-confer w/ client re status and matters	250.00	1.40	350.00	Billable
3/3/2008 44048	JHS Meeting with Meeting with WSS to review Trustee's Report of items needed in support of plan etc. Draft schedule of monthly income.	100.00	0.50	50.00	Billable
3/4/2008 43683	WSS Meeting with Meeting with client to review amendments to plan and related matters	250.00	1.40	350.00	Billable
3/10/2008 43696	WSS Review Review memo from Trustee re status of case and respond	250.00	0.80	200.00	Billable
3/19/2008 44057	WSS Attend Attend confirmation hearing in Staunton	250.00	2.50	625.00	Billable
4/24/2008 44989	WSS Meeting with Meeting with client to discuss stock in Inter-Prod and Majestic	250.00	1.30	325.00	Billable
4/29/2008 45231	WSS Draft Draft letter to attorney for S. Miller re stock buy-out	250.00	1.00	250.00	Billable

5/2/2008
12:59 PMSCOTT KRONER, PLC
Pre-bill Worksheet

Page 4

MURRAY DANIEL: Daniel Alan Murray (continued)

				Amount	Total
TOTAL	Billable Fees	45.40			\$8,050.00
Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
12/28/2007	WSS	30.00	1.000	30.00	Billable
42273	\$Misc. Expenses Online Credit Reporting - 1 report Custom Text: firm				
1/4/2008	WLM	0.15	336.000	50.40	Billable
41163	\$Photocopies Photocopying Charge				
1/4/2008	WSS	16.82	1.000	16.82	Billable
41178	\$Postage Postage Charge				
2/5/2008	WSS	0.485	100.000	48.50	Billable
43159	\$Mileage Mileage to/from Staunton				
3/7/2008	WSS	0.41	1.000	0.41	Billable
43577	\$Postage Postage Charge				
3/19/2008	WSS	0.485	90.000	43.65	Billable
44058	\$Mileage Mileage to/from Staunton				
3/25/2008	WSS	0.41	2.000	0.82	Billable
44027	\$Postage Postage Charge				
5/1/2008	WSS	0.41	2.000	0.82	Billable
45335	\$Postage Postage Charge				
TOTAL	Billable Costs				\$191.42

Calculation of Fees and Costs

	Amount	Total
Fees Bill Arrangement: Slips By billing value on each slip.		
Total of billable time slips	\$8,050.00	

5/2/2008
12:59 PM

SCOTT KRONER, PLC
Pre-bill Worksheet

Page 5

MURRAY DANIEL: Daniel Alan Murray (continued)

	<u>Amount</u>	<u>Total</u>
Total of Fees (Time Charges)		\$8,050.00
Costs Bill Arrangement: Slips By billing value on each slip.		
Total of billable expense slips	\$191.42	
Total of Costs (Expense Charges)		\$191.42
		<hr/>
Total new charges		\$8,241.42
Accounts Receivables		
<u>Date</u> <u>ID</u> <u>Type</u> <u>Description</u>		
1/7/2008 PAY Payment-WSS/JHS: \$4850.00; exps.: \$46. Check No. T/A 35333 14020	(\$4,896.00)	
Total Accounts Receivable		(\$4,896.00)
New Balance		
Current	\$8,241.42	
Unapplied	(\$4,896.00)	
		<hr/>
Total New Balance		<u><u>\$3,345.42</u></u>

5/2/2008
1:00 PM

SCOTT KRONER, PLC
A/R with Running Balances

Page 1

Selection Criteria

Clie.Selection Include: MURRAY DANIEL

Client	Date	Type	Description	Value	Balance
MURRAY DANIEL					
Beginning Balance					0.00
1/7/2008	PAY		Payment-WSS/JHS: \$4850.00; exps.: \$46. Check No. T/A 35333	(4896.00)	(4896.00)
Ending Balance					(4896.00)
Grand Total					0.00
Total Added					0.00
Total Removed					(4896.00)
Ending Balance Total					(4896.00)